

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**INTELLECTUAL VENTURES I LLC AND  
INTELLECTUAL VENUTRES II, LLC,**

**Plaintiff,**

**vs.**

**AMERICAN AIRLINES, INC.,**

**Defendant.**

**Civil Action No. 4:24-cv-00980**

**JURY TRIAL**

**DEFENDANT AMERICAN AIRLINES, INC.'S NOTICE OF COMPLIANCE WITH  
PATENT RULE 4-3**

Patent Rule 4-3 requires that “[e]ach party shall also simultaneously serve a disclosure of expert testimony consistent with Fed. R. Civ. P. 26(a)(2)(B(i)-(ii) or 26(a)(2)(C) for any expert on which it intends to rely to support its proposed claim construction or indefiniteness position or to oppose any other party’s proposed claim construction or indefiniteness position.” *See also Uniloc 2017 LLC v. Samsung Electronics America, Inc.*, Case No. 2-18-cv-00508, Dkt. 59 at 2-3 (E.D. Tex. Jan. 5, 2020).

While American was unable to “simultaneously” serve expert declarations because IV did not serve an expert declaration, American otherwise complied with Patent Rule 4-3.

Dated: August 5, 2025

/s/ John B. Campbell

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ATTORNEYS FOR DEFENDANT  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via email on August 5, 2025.

/s/ John B. Campbell  
John B. Campbell